EXHIBIT 1

Proposed Order

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN

)
In re) Chapter 9
CITY OF DETROIT, MICHIGAN) Case No.: 13-53846
Debtor.) Hon. Steven W. Rhodes
)

ORDER STRIKING TOPIC NO. 29 FROM THE NOTICE OF THE DEPOSITION OF THE CITY OF DETROIT FILED BY SYNCORA

This matter comes before the Court on the Motion of the City of Detroit, Michigan, pursuant to Federal Rule of Civil Procedure 26(c), as made applicable to this proceeding by Federal Rule of Bankruptcy Procedure 7026, for entry of a protective order striking Syncora's demand in its Rule 30(b)(6) deposition notice for the personal financial information of all City retirees; and the Court being fully advised in the premises:

IT IS HEREBY ORDERED THAT:

- 1. The Motion is GRANTED.
- 2. Syncora is directed to strike from its Notice of Deposition Pursuant to Rule 30(b)(6), *see* Dkt. No. 4403, deposition topic 29.